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October 11, 2023

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Hon. Mark. Pedersen
United States Magistrate Judge
Western District of New York
100 State Street
Rochester, NY 14614

Re: Hall v Warren: 21-cv-6296
Case No.: 21-cv-6296

Dear Judge Pedersen,

The parties have engaged in extensive written dialogue over an ESI protocol, which is due to be filed today. Unfortunately, we have been unable to reach a final agreement despite diligent efforts by all counsel.

At this point, the parties request an extension to the ESI protocol submission date pending a conference with the court, as requested by plaintiffs' counsel at this juncture.

Given the attorneys respective schedules, we would request the conference be scheduled after October 28, 2024 as may be convenient with the court.

Respectfully submitted,

s/ Patrick B. Naylon

Patrick B. Naylon

Cc: All counsel via ECF
& E-mail to Judge Pedersen



